



West Lake Landfill Materials Management Plan - DNR concerns

Shawn Muenks

to:

rick.walker

02/21/2008 12:32 PM

Cc:

"larry.erickson", "Aaron Schmidt", "bob.geller", Andrew.McKinney, "Scott Waltrip", "John Boessen", Gene Gunn, Diane Easley, Daniel Wall

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1 Attachment



Federal Facilities Section org chart.pdf

Rick,

Per our conference call 2/8/08, the department is submitting the following list of concerns that were observed during our site visit on 2/7/08 to the West Lake Landfill. Please provide response and course of action for each item noted below:

The Materials Management Plan (MMP) notes several requirements for allowable placement of fill and/or stockpiling activities within the Operable Unit 1, Areas 1 and 2. The conditions observed in the field that did not meet these requirements are as follows:

1. The lateral extents of designated areas for stockpiling and/or fill within the radiological areas (Area 1 and 2) were not surveyed prior to placement per the approved plan.
2. It was not apparent if the material was placed in 1 to 2 ft. lifts during placement to achieve proper compaction requirements.
3. The MMP calls for a maximum height of 5 feet of permanent fill and an additional 5 feet of stockpiled material on top of the permanent fill for a total of 10 feet. It appeared that this height had been exceeded within both areas.
4. The MMP calls for the perimeter of the designated areas for placement to be delineated with concrete barriers or other physical means to restrict disposal to these areas. No such barriers were observed.
5. Signage or other means to identify designated areas for placement were not present as well as signage to denote radiological areas.
6. Per the plan, access roads to designated areas for stockpiling should be constructed to a maximum width of 60 feet. It appeared that the access road to Area 2 exceeded this requirement.
7. It was not apparent if dust control measures had been taken such as watering during dry periods. The MMP also calls for stockpiled or permanent fill to be covered with a minimum of 12 inches of intermediate soil cover after final placement to prevent wind transport.
8. A decontamination pad with plastic liner to collect heavy equipment wash water was not observed.

The following requirements pertain to Health and Safety Plans outlined in the MMP:

1. A Radiation and Health Safety Officer (RSHO) must be identified, please identify this person.
2. The RSHO is responsible for personnel and vehicle screening and decontamination and maintaining records of these activities. It was not apparent if these practices were followed. Please provide records of these activities if available.
3. The MMP calls for at least annual inspections of fill materials, designated stockpile/fill areas, and records of screening and decontamination activities by a qualified geologist, engineer, health physicist or safety engineer. Please provide documentation to support this.

The following are other issues noted during the site visit for which the department requests response:

1. If any grubbing or tree removal had taken place prior to placement of fill material, please provide documentation that the material remained on site or was characterized and disposed of properly.
2. During the site visit, it was noted that gates on the western perimeter fence were unlocked and the combination locks were hanging open in the latches.

If you need clarification on any of these items or have questions, please give me a call.

As promised attached is an organizational chart for our section within the Hazardous Waste Program of the Department of Natural Resources and some contact numbers as follows:

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 Aaron Schmidt, DOE Unit Chief (573)751-3154
 Shawn Muenks, West Lake Project Manager (573)751-3107
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